

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**DERRICK JACOBS**

**CIVIL COMPLAINT NUMBER: 19-CV-4616**

**V.**

**CITY OF PHILADELPHIA, et al.**

**PLAINTIFF'S MOTION TO COMPEL DISCOVERY FROM DEFENDANTS**

1. The plaintiff has made numerous discovery requests of the defendants. The request have included request for depositions and documents. The plaintiff has also submitted subpoenas for depositions and documents.
2. To date, the defendants have refused to provide any documents, availability for deposition dates, and have not filed any motions to quash subpoenas.
3. The plaintiff has been extremely patient and the defendants remained unresponsive to any of the plaintiff's discovery request.
4. Upon information and belief, recently received information, Nancy Winkleman was overheard telling the front desk security officer (Michael Carter) at the Philadelphia District Attorney's Office not to accept any subpoenas from Derrick Jacobs.

**REQUESTED DOCUMENTS AND DEPOSITIONS**

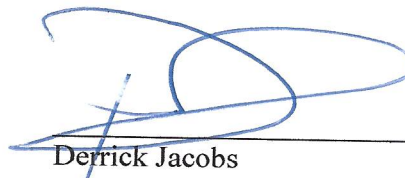
5. Plaintiff request for the production of documents dated February 6, 2023 (Exhibit A).
6. Plaintiff request for the production of documents dated February 7, 2023 (Exhibit B).
7. Plaintiff's request for the production of documents dated March 23, 2023 (Exhibit C).
8. Defendants' response to March 23, 2023 request for documents (Exhibit D).
9. District Attorney Lawrence Krasner deposition subpoena dated for May 12, 2023. The defendants have refused to respond to plaintiff. The defendants also have violated the FRCP and never filed a motion to quash opposing the subpoena (Exhibit E).

10. Krasner document subpoena dated May 13, 2023 (Exhibit F). No motion to quash filed.
11. Krasner document subpoena dated May 24, 2023 (Exhibit G). No motion to quash opposing the subpoena filed.
12. City of Philadelphia and District Attorney's Office subpoena dated May 24, 2023 (Exhibit H). No motion to quash opposing the subpoena filed.

**FEDERAL RULES OF CIVIL PROCEDURE VIOLATIONS**

13. The defendants are in violation of FRCP rules 26, 34, and 45. Sanctions are requested and warranted under FRCP rule 37.
14. Local Rules of Civil Procedure 26.1(g) states a routine motion to compel answers to interrogatories or to compel compliance with a request for production under Fed.R.Civ.P. 34, wherein it is averred that no response or objection has been timely served, need have no accompanying brief, and need have no copy of the interrogatories or Rule 34 request attached. The court may summarily grant or deny such motion without waiting for a response

Date: 7/11/2023



Derrick Jacobs

Plaintiff

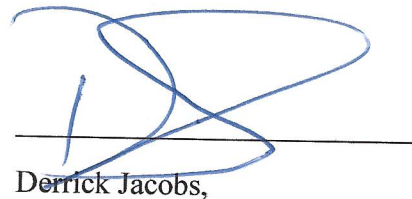
Pro Se

**CERTIFICATE OF SERVICE**

I, Derrick Jacobs, Plaintiff within the above-captioned matter, hereby certify that a true and correct copy pursuant to the Federal Rules of Civil Procedure was sent via ECF/email upon the listed parties on the date shown below,

*Attorneys for Defendants(s)*

Date: 7/11/2023



Derrick Jacobs,

Plaintiff

Pro se